

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

WAYNE A. BRADSHAW, *on his own behalf* )  
*and on behalf of all others similarly situated,* )  
15320 Sixes Rd. )  
Emmitsburg, Maryland 21727-7804 )  
(Frederick County) )

Plaintiff, )

v. )

HILCO RECEIVABLES, LLC, )  
One Northbrook Place )  
Northbrook, Illinois 60062, )

Defendant. )

CASE NO.:

**NOTICE OF REMOVAL**

Now comes Defendant Hilco Receivables, LLC (“Hilco”), pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 15 U.S.C. § 1692k, and files this Notice of Removal, and in support hereof sets forth the following grounds:

1. On September 17, 2009, Plaintiff Wayne A. Bradshaw (“Bradshaw”), on his own behalf and on behalf of all others similarly situated, filed this action in the Circuit Court for Frederick County (“Circuit Court Action” or “the Action”). The Action was docketed as Case No. 10-C-09-003612-OC. The Defendant in the action is Hilco. A copy of the Complaint is attached to this Notice.

2. In this case, Plaintiff alleges that Hilco engaged in debt collection activities and did so unlawfully. Count I of the Complaint seeks declaratory and injunctive relief. Id. ¶¶ 29-32. Count II alleges a violation of the Maryland Consumer Debt Collection Act. Id. ¶¶ 33-39. Count III alleges a violation of the Maryland Consumer Protection Act. Id. ¶¶ 40-42. Count IV

alleges a violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692. Id. ¶ 43-48. Plaintiff has demanded a jury trial in this action.

3. On September 24, 2009, the Circuit Court for Frederick County issued a Summons directed to Hilco. A copy of the Summons is attached to this Notice.

4. On or after December 16, 2010, Hilco was served with process in the Circuit Court Action. This Notice of Removal is being filed within 30 days of service of process.

5. This case is removable to the United States District Court for the District of Maryland because this suit could have been brought in federal court based on federal-question jurisdiction:

a. Plaintiff's Complaint purports to set forth a cause of action under the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692 *et seq.*

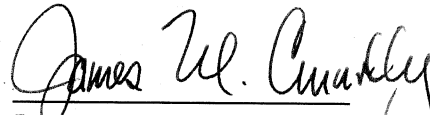
b. This Court has original jurisdiction over Plaintiff's cause of action based on 15 U.S.C. §§ 1692, *et seq.*, as set forth in 28 U.S.C. § 1331 and 15 U.S.C. § 1692k(d). Pursuant to 28 U.S.C. § 1441, therefore, the Circuit Court Action is removable to this Court.

6. Copies of all process, pleadings and orders served upon Defendant Hilco Receivables, LLC in this action are attached hereto.

7. Promptly after filing this Notice, undersigned counsel shall file a copy of this Notice with the Clerk of the Circuit Court for Frederick County.

WHEREFORE, Defendant Hilco Receivables, LLC prays that the above-captioned action now pending in the Circuit Court for Frederick County, Maryland, be removed therefrom and

placed on the regular docket of the United States District Court for the District of Maryland.



James M. Connolly (Bar No. 23872)

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LLC*

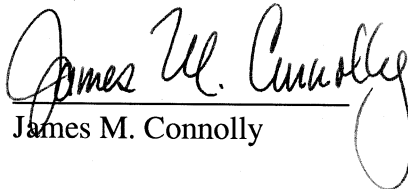
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on January 15, 2010, a copy of the foregoing with attachments was mailed first class, postage prepaid, to:

Scott C. Borison, Esquire  
Janet S. Legg, Esquire  
Phillip Robinson, Esquire  
*Legg Law Firm, LLC*  
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P.O. Box 503  
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James M. Connolly